

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Consolidated Civil Action**

RALEIGH WAKE CITIZENS  
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD  
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,  
et al.,

Defendants.

No. 5:13-cv-607

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**DECLARATION OF EDWIN M. SPEAS IN SUPPORT OF PLAINTIFFS' REQUEST FOR  
ATTORNEYS' FEES AND LITIGATION EXPENSES**

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I, Edwin M. Speas, being duly sworn according to law, upon my oath, declare and say as follows:

1. I am over the age of 18 and am competent to testify herein. I have personal knowledge of the matters stated herein.

2. I am a partner with the law firm of Poyner Spruill LLP ("Poyner Spruill") in Raleigh, N.C.

3. Since graduating Wake Forest University School of Law in 1971, I have been engaged in the practice of law representing both plaintiffs and defendants in litigation in a range of matters. Over the course of my career, I have served as North Carolina's Chief Deputy Attorney General, head of the Attorney General's special litigation unit and general counsel for Governor Beverly Perdue.

4. I have substantial experience in redistricting litigation. While a member of the Attorney General's staff, I participated in representing the State of North Carolina in *Shaw v. Reno*, 509 U.S. 630 (1993); *Shaw v. Hunt*, 517 U.S. 899 (1996); *Hunt v. Cromartie*, 526 U.S. 541 (1999); *Easley v. Cromartie*, 532 U.S. 231 (2001); and *Stephenson v. Barlett*, 355 N.C. 354, 562 S.E.2d 377 (2002). Since joining Poyner Spruill, I have participated in representing the plaintiffs in *Dickson v. Rucho*, 367 N.C. 542, 766 S.E.2d 238 (2014); *Harris v. McCrory*, No. 1:13-cv-00949; and *Covington v. North Carolina*, No. 1:15-cv-00399 (M.D.N.C.).

5. I have known Anita Earls for more than 20 years. Over the past five years, she and I have worked side-by-side on a number of voting rights cases. She has been a talented, knowledgeable, efficient and effective advocate for her clients in all the matters on which we have worked. Experts in the voting rights field count her as one of the nation's best voting rights lawyers.

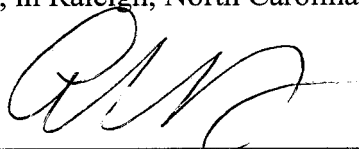
6. I have also worked side-by-side with Allison Riggs over the last five years on a number of voting rights cases. Like Ms. Earls, Ms. Riggs is a talented, knowledgeable, efficient and effective advocate for her clients. Lawyers across the country count her as one of the nation's best, young, voting rights advocates. She has devoted almost her entire practice to voting rights, so her experience in the field is exceptionally concentrated given her years in practice.

7. I am generally familiar with the rates charged for voting rights litigation in North Carolina now and in the past. My understanding is that Ms. Earls is requesting \$ 550 per hour for her services in this case and that Ms. Riggs is requesting \$400 per hour for her services. Based on my experience, these rates are comparable to rates currently requested by other similarly experienced and qualified attorneys in voting rights litigation in North Carolina, and accurately reflect the value of their services to their clients. .

8. I am also familiar with the level of effort required to prepare and present a strong case for the parties to voting rights litigation. I know Ms. Earls and Ms Riggs to be efficient advocates for their clients - in addition to being effective advocates for their clients – and it appears to me that the hours for which they seek compensation were reasonably necessary to obtain the victory they obtained. for their clients

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this the 23<sup>rd</sup> day of November, 2016, in Raleigh, North Carolina..

  
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Edwin M. Speas